OGDEN POWER PACIFIC, INC.
PACIFIC WOOD FUELS COMPANY
8755 Enterprise Dr.
Jamestown, CA 95327
Telephone: 209 984-4660
Fax: 209 984-3398

June 30, 1998

CALFED Bay-Delta Program
1416 Ninth St., Suite 1155
Sacramento, CA 95814
Attn: Rick Breitenbach

Re: Draft EIS/EIR

VIA FAX AND MAIL

Dear Mr. Breitenbach:

Ogden wishes to make the following comments on the Draft EIS/EIR:

The graphic shown throughout the Phase II Interim Report depicts the Bay-Delta water solution idealistically as a jigsaw puzzle with each piece being of equal size, leading the reader to conclude that each part of the solution carries equal weight. In reality, the main focus of the Draft EIS/EIR, as currently written, are the variable program elements of Conveyance and Storage. Ogden believes that Watershed Management *above the dams* can play as vital a role as conveyance and storage, yet it remains as a relatively small unexplored and ill-defined "puzzle piece". **Management of the upper watersheds needs to be elevated in importance and analyzed as an integral part of the conveyance and storage solution**.

Clearly California needs more useable water with or without more storage or better conveyance systems. We can get it through building more storage to catch excess winter and spring runoff or through improved water conservation measures by agriculture and urban users. These solutions are relatively easy to define and evaluate. However, it is becoming clear from scientific studies that a long-term commitment to restoring the watersheds above the dams, the *"wells"* for California's water system, can be a major part of the water supply and timing solution. This bears serious further investigation.

The US Forest Service alone has estimated that 1-2 million acre feet/year of additional water could be produced from it's California lands by large scale application of management practices under current watershed management policy. This is accomplished through integrated application of several management practices:

- → **Thinning excess vegetation to reduce evapotranspiration loss.**
- → **Removal of the huge buildup of forest ground and ladder fuels to reduce the risk of large-scale watershed disturbance from catastrophic wildfires.**
- → **Restoration of damaged meadows, stream channels, and riparian areas to increase upper watershed water storage and delay the timing of water release.**
- → **Fix eroding road systems and compacted soils which contribute to sediment loading in streams and dams and high peak flows during storm events.**

C-015988

It is obvious that construction of any of the Central Valley conveyance and storage systems described in the alternatives will be costly to California water users and will take a long-term financial commitment. To complicate matters further, even though agricultural interests desperately seek an assured supply of water, they are unwilling to convert currently productive agricultural land to constructed conveyance and seasonal water storage. **Ogden believes that there is tremendous potential to increase meadow and riparian area storage of water in the upper watersheds at a much lower cost to water users**. Focusing effort on the upper watersheds makes more sense because there would be no need to change land use to build water storage. ***In the upper watersheds, the land is already dedicated to water storage and production!*** These watersheds just need some TLC to do their water production job better.

Finally, Ogden urges CALFED to require that any money spent on upper watershed management be aimed at real on-the-ground projects that will result in improved water yield, timing, and quality. Money wasted on another bureaucratic process, such as the EIS/EIR describes in the Watershed Management Strategy Appendix, should be minimized.

Ogden appreciates the opportunity to comment on the CALFED draft EIS/EIR. We remain anxious to participate in forming the evolving solution to California's water supply solution.

Sincerely Yours,

Chris Trott
Manager, Wood Fuel Supply

cc: M. J. McFadden
T. Mason
B. Judd
B. Allen
B. Ellery
S. Jolley
D. Bischell